

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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XIAMIN ZENG,

Plaintiff, **NOTICE OF MOTION FOR
SUMMARY JUDGMENT**

-against-

19 Civ. 3218 (JGK) (KHP)

THE CITY OF NEW YORK, DETECTIVE DANIELLE
FEBUS [RANK FY20000], INSPECTOR JOHN CHELL,
DETECTIVE GARY DENEZZO [RANK FY20000],
SERGEANT GEORGE TAVARES (#5354), POLICE
OFFICER IRWIN LUPERON (SHIELD NO #27763),
POLICE OFFICER ERLINE WILTSHIRE (SHIELD NO.
#24340), and POLICE OFFICER CHRISTOPHER ROBLEY
(#23263), in both their individual and professional capacities,

Defendants.

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PLEASE TAKE NOTICE that, upon the Declaration of Jeffrey F. Frank, dated March 10, 2023; the exhibits annexed thereto; the defendants' Statement of Undisputed Facts pursuant to Local Civil Rule 56.1; the accompanying Memorandum of Law, dated March 10, 2023; and all pleadings and proceedings previously had herein, defendants City of New York and Detective Danielle Febus will move before the Honorable John G. Koeltl, United States District Judge, at the United States Courthouse for the Southern District of New York, located at 500 Pearl Street, New York, New York 10007, for an Order pursuant to Rule 56 of the Federal Rules of Civil Procedure dismissing all claims asserted by plaintiff Xiamin Zeng in her second amended complaint, together with such other and further relief as this Court deems just and proper.

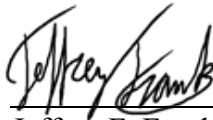
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PLEASE TAKE FURTHER NOTICE that, pursuant to the Court's February 6, 2023 Order (Docket Entry No. 108), plaintiff's opposition must be served on defendants on or before March 31, 2023, and defendants' reply papers, if any, must be served on plaintiff on or before April 14, 2023.

Dated: New York, New York
March 10, 2023

HON. SYLVIA O. HINDS-RADIX
Corporation Counsel of the City of New York
Attorney for Defendants City & Febus
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By:



Jeffrey F. Frank
Assistant Corporation Counsel
Special Federal Litigation

cc: All Counsel (via ECF)